

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

TONY KOLE and GHOST INDUSTRIES, LLC,)	
an Illinois limited liability company,)	
)	
Plaintiffs,)	
)	Case No. 11 CV 3871
v.)	
)	
VILLAGE OF NORRIDGE, an Illinois municipal)	
corporation,)	
)	
Defendant.)	

PLAINTIFFS' L.R.56(b)(3)(C) STATEMENT OF ADDITIONAL UNDISPUTED FACTS

NOW COME the Plaintiffs, Tony Kole and Ghost Industries, LLC, an Illinois limited liability company, by and through undersigned counsel, and, pursuant to L.R. 56(b)(3)(C), submits their Statement of Additional Undisputed Facts in Response to Defendant's F.R.Civ.P. 56(a) Motion for Summary Judgment, and therefore states as follows:

1-39. Plaintiff incorporates and realleges Paragraph 1 through 39, inclusive, of their *L.R. 56(a)(3) Statement of Undisputed Facts* (Dkt. #197), as if fully repeated herein.

WHEREFORE, the Plaintiffs, Tony Kole and Ghost Industries, LLC, an Illinois limited liability company, requests this Honorable Court to deny Defendant's F.R.Civ.P. 56(a) Motion for Summary Judgment in its entirety, as well as any and all further relief as this Court deems just and proper.

Dated: October 8, 2016

Respectfully submitted,

By: /s/ David G. Sigale
Attorney for Plaintiff

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CERTIFICATE OF ATTORNEY AND NOTICE OF ELECTRONIC FILING

The undersigned certifies that:

1. On October 8, 2016, the foregoing document was electronically filed with the District Court Clerk *via* CM/ECF filing system;
2. Pursuant to F.R.Civ.P. 5, the undersigned certifies that, to his best information and belief, there are no non-CM/ECF participants in this matter.

/s/ David G. Sigale
Attorney for Plaintiffs

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